

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of the Commission, on its) RULE AND REGULATION NO. 161
Own Motion, seeking to amend Title 291,)
Chapter 1, Rules of Commission)
Procedure, to rewrite a substantial)
portion of the Rules; correct technical)
errors, grammar, punctuation, spelling,)
sequential numbering and the like; and)
reprint the Chapter in its entirety.)

**COMMENTS AND PROPOSED REVISIONS TO RULES SUBMITTED
BY THE INCUMBENT LOCAL EXCHANGE CARRIER GROUP**

By Order entered August 31, 2004, the Commission, on its own motion, opened this docket for the purposes noted in the caption to this docket. In such Order the Commission requested that comments on its proposed changes to Title 291, Chapter 1, Rules of Commission Procedure (the "Rules") be submitted on or before 5:00 p.m. (CDT) on October 15, 2004.

These Comments are submitted on behalf of the Incumbent Local Exchange Carrier Group ("ILEC Group") that consists of those carriers named in the signature block of these Comments.

Attached hereto as Exhibit A is a copy of the ILEC Group's proposed revisions to the Rules. In preparing Exhibit A, all of the Commission's proposed changes as highlighted in the Appendix to the Order were accepted, and the ILEC Group's proposed revisions are shown as highlighted additions or deletions in Exhibit A. Rather than providing an explanation of the proposed revisions in these Comments, the ILEC Group intends to present testimony to explain the rationale for such revisions which will be provided by one or more of its representatives at the public hearing concerning the Rules

that the Commission indicates in the Order will be scheduled at a future date in accordance with the requirements of the Nebraska Administrative Procedures Act.

Dated: October 15, 2004.

THE INCUMBENT LOCAL EXCHANGE
CARRIER GROUP:

ALLTEL NEBRASKA, INC.,
ARLINGTON TELEPHONE COMPANY,
THE BLAIR TELEPHONE COMPANY,
CAMBRIDGE TELEPHONE COMPANY,
CITIZENS TELECOMMUNICATIONS
COMPANY OF NEBRASKA d/b/a
FRONTIER COMMUNICATIONS OF
NEBRASKA, CLARKS
TELECOMMUNICATIONS CO.,
CONSOLIDATED TELCO, INC.,
CONSOLIDATED TELCOM, INC.,
CONSOLIDATED TELEPHONE
COMPANY, DALTON TELEPHONE
COMPANY, INC., EASTERN
NEBRASKA TELEPHONE COMPANY,
ELSIE TELECOMMUNICATIONS, INC.,
GREAT PLAINS COMMUNICATIONS,
INC., HAMILTON TELEPHONE
COMPANY, HARTINGTON
TELECOMMUNICATIONS CO., INC.,
HEMINGFORD COOPERATIVE
TELEPHONE COMPANY, HERSHEY
COOPERATIVE TELEPHONE
COMPANY, K & M TELEPHONE
COMPANY, INC., NEBRASKA
CENTRAL TELEPHONE COMPANY,
NORTHEAST NEBRASKA TELEPHONE
COMPANY, ROCK COUNTY
TELEPHONE COMPANY, SOUTHEAST
NEBRASKA TELEPHONE COMPANY,
STANTON TELECOM, INC., and THREE
RIVER TELCO.

By:

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Their Attorneys

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of October, 2004, the original and five (5) paper copies, together with an electronic copy, of the foregoing Comments were served upon Andy S. Pollock, Executive Director of the Commission, by hand delivery.

Paul M. Schudel

EXHIBIT A

ILEC GROUP'S PROPOSED CHANGES TO THE RULES